



The Risk Based Compliance Alternative for Table 3 Compounds

NR 445 Technical Advisory Work Group
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Jeff Myers, Bureau of Air Management
608-266-2879
e-mail: myersj@dnr.state.wi.us



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This Proposal Was Introduced at the April 27, 2000 TAG

- ◆ **A facility may elect to take enforceable emission limits in its permit if it can demonstrate through site specific modeling that total facility emissions of all Table 3 HAPs do not exceed 10-5 risk beyond the fence line**
- ◆ **This is an option to BACT/LAER for facilities whose allowable emissions exceed the threshold levels**



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Background for Compliance Option Proposal

- ◆ Industry representatives expressed concern about the time, money and lack of flexibility associated with BACT/LAER for emissions that do not pose a great risk.
- ◆ Environmental representatives expressed concern about the risks associated with facility-wide emissions.
- ◆ The Department's interest is to protect public health with existing resources.



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Details of Proposal:

- ◆ Emissions of all Table 3 compounds are included in the assessment:
 - emissions from NR 445 exempted sources
 - emissions from MACT sources
- ◆ Site specific modeling uses operational parameters to be included as permit conditions



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Details (Compliance Option continued)

- ◆ **Risk assessment**
 - **Best available modeling techniques to estimate impact from hard to model sources**
 - **Modeling would use site specific information and local meteorological data**
 - **Additive impact in cases where multiple Table 3 compounds are released**



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What about HAPs with unknown potencies?

- ◆ **Original Proposal: Preclude a facility with any Table 3 emissions with an unknown potency factor from option.**
- ◆ **Impact of original proposal:**
 - **Feedback from TAG members: 2 responses only.**
Emissions < 1 lb./year of POM (combustion of virgin-fossil fuels)
 - **Air Emissions Inventory: Most facilities that emit Table 3 compounds with unknown potency factors emit < 10 lb/year.**
 - **NOTE: Uncertainty because of limited data**



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Revised Proposal: Table 3 HAPs with unknown potency factors

- ◆ If allowable emissions are < 10 lb/yr, exclude them from the modeling assessment
- ◆ If allowable emissions are > 10 lb/year, facility may not use this compliance option



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Rationale for revised proposal

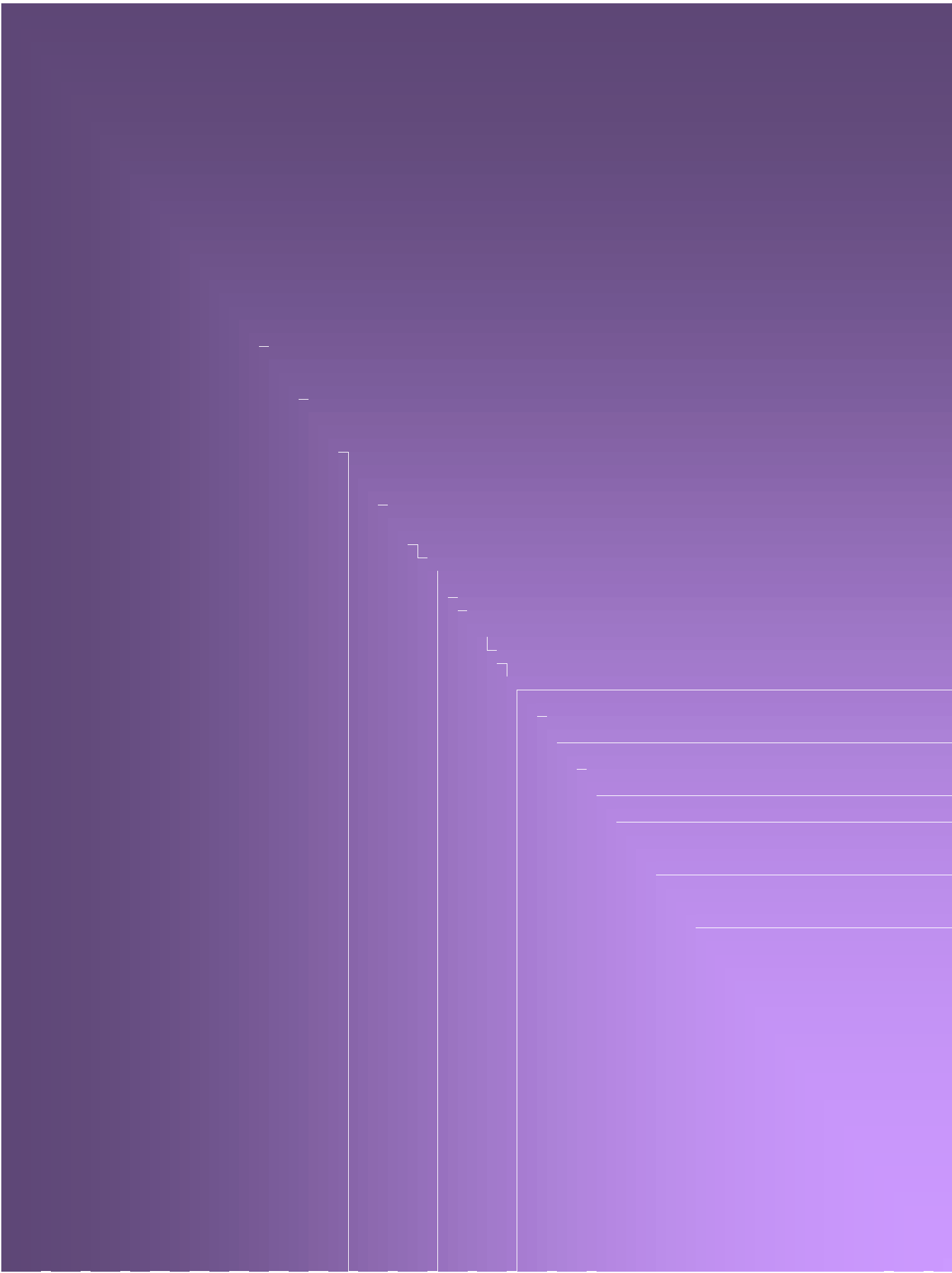
- ◆ **NR 445 Proposed Threshold for Table 3 compounds with unknown potency factors is 10 lb/yr.**



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BACT or LAER

- ◆ Sources currently meeting BACT or LAER would be able to utilize in lieu of control requirements
- ◆ Permit restrictions may be removed in the future provided source meets applicable BACT or LAER emission standard prior to doing so





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APPLICABILITY & COMPLIANCE OPTIONS

